

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NML CAPITAL, LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

-----X

03 Civ. 8845 (TPG)
05 Civ. 2434 (TPG)
06 Civ. 6466 (TPG)
07 Civ. 1910 (TPG)
07 Civ. 2690 (TPG)
07 Civ. 6563 (TPG)
08 Civ. 2541 (TPG)
08 Civ. 3302 (TPG)
08 Civ. 6978 (TPG)
09 Civ. 1707 (TPG)
09 Civ. 1708 (TPG)

PLAINTIFF'S NOTICE OF MOTION FOR DISCOVERY SANCTIONS

PLEASE TAKE NOTICE that upon the accompanying Declaration of Robert A. Cohen, all attached exhibits, the accompanying Memorandum of Law, and all prior proceedings herein, Plaintiff NML Capital, Ltd., ("Plaintiff") will move, pursuant to Rule 37 of the Federal Rules of Civil Procedure, before the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court, for an Order granting Plaintiff's Motion for Discovery Sanctions and for such other relief as the Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that the Republic of Argentina's response to this Motion, if any, shall be served within seven (7) days after service hereof, on counsel for Plaintiff: Robert A. Cohen, Dechert LLP, 1095 Avenue of the Americas, New York, NY 10036-6797.

Dated: New York, New York
June 17, 2015

Respectfully Submitted,

DECHERT LLP

By: /s/ Robert A. Cohen

Robert A. Cohen

(robert.cohen@dechert.com)

Debra D. O’Gorman

(debra.o’gorman@dechert.com)

Collin F. Hessney

(collin.hessney@dechert.com)

1095 Avenue of the Americas

New York, NY 10036-6797

Telephone (212) 698-3500

Facsimile (212) 698-3599

Attorneys for Plaintiff NML Capital, Ltd.